

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD, *ET AL.*,
PLAINTIFFS,

v.

TRAMMEL CROW, JR., *ET AL.*,
DEFENDANTS.

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CAUSE NO. 5:23-CV-00580-FB

**DEFENDANT CODY MITCHELL'S ANSWER IN RESPONSE TO PLAINTIFFS'
SECOND AMENDED COMPLAINT**

Defendant Cody Mitchell ("Defendant"), through the Office of the Attorney General of Texas, files this Answer in response to Plaintiffs' Second Amended Complaint.

GENERAL DENIAL

Pursuant to Fed. R. Civ. P. 8(b) and for the express purpose of requiring Plaintiffs Julia Hubbard and Kayla Goedinghaus ("Plaintiffs") to meet their burden of proof in this suit, Defendant denies every allegation contained in Plaintiffs' Second Amended Complaint, ECF No. 292, except those expressly admitted herein.

SPECIFIC ADMISSIONS AND DENIALS

A. Nature of the Case

1. Defendant is without sufficient information or knowledge to admit or deny that Rick Hubbard ran a sex trafficking venture ("Venture"), or that he ran such a Venture with those named in paragraph 1.

2. Defendant is without sufficient information or knowledge to admit or deny the allegations in paragraph 2. Defendant denies the allegations contained in paragraph 2 to the extent that they pertain to him.

3. Defendant is without sufficient information or knowledge to admit or deny the

allegations in paragraph 3.

4. Defendant denies the allegations in paragraph 4 to the extent they pertain to him.

5. Defendant is without sufficient information or knowledge to admit or deny the allegations in paragraph 5. To the extent the allegation in this paragraph pertain to him, Defendant denies any and all allegations therein.

6. Defendant denies the allegations in paragraph 6 to the extent they pertain to him.

7. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 7.

8. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 8.

9. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 9.

10. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 10.

11. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 11.

12. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 12.

13. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 13.

14. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 14.

15. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 15.

16. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 16.

17. Defendant denies the allegations in paragraph 17 to the extent they pertain to him. Defendant does not have sufficient information or knowledge to admit or deny the remaining allegations in paragraph 17.

18. Defendant admits he is a Texas Ranger that specializes in human trafficking. Defendant denies all remaining allegations in paragraph 18.

19. Defendant admits he knew Rick Hubbard when they went to the same grade school together. Defendant denies the remaining allegations to the extent they pertain to him in paragraph 19.

20. Defendant denies the allegations in paragraph 20.

21. Defendant denies the allegations in paragraph 21.

22. Defendant denies the allegations in paragraph 22.

23. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 23.

24. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 24.

25. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 25.

26. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 26.

27. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 27.

28. Defendant does not have sufficient information or knowledge to admit or deny the

allegations in paragraph 28.

29. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 29.

30. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 30.

31. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 31.

32. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 32.

33. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 33.

34. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 34.

35. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 35.

36. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 36.

37. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 37.

38. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 38.

39. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 39 or its sub-parts.

40. Defendant does not have sufficient information or knowledge to admit or deny the

allegations in this paragraph 40. Defendant denies the allegations to the text they pertain to him.

41. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 41.

42. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 42.

43. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 43.

44. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 44.

45. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 45.

46. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 46.

47. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 47.

48. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 48.

49. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 49.

50. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 50.

51. Defendant does not have sufficient information or knowledge to admit or deny the allegations in paragraph 51.

B. Jurisdiction and Venue

52. Paragraph 52 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

53. Paragraph 53 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

54. Paragraph 54 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

55. Paragraph 55 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

56. Paragraph 56 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

57. Paragraph 57 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, Defendant admits he resides in this District.

58. Paragraph 58 sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

C. Parties

59. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

60. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

61. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

62. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

63. Defendant is without sufficient information or knowledge to be able to admit or deny

where this party resides.

64. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

65. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides or when he may have expired.

66. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

67. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

68. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

69. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

70. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

71. Admit.

72. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

73. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

74. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

75. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

76. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

77. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

78. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

79. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

80. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

81. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

82. Defendant is without sufficient information or knowledge to be able to admit or deny where this party resides.

83. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 83.

D. Statement of Facts

84. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 84.

85. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 85.

86. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 86.

87. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 87.

88. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 88.

89. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 89.

90. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 90.

91. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 91.

92. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 92.

93. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 93.

94. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 94.

95. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 95.

96. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 96.

97. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 97.

98. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 98.

99. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 99.

100. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 100.

101. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 101.

102. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 102.

103. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 103.

104. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 104.

105. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 105.

106. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 106.

107. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 107.

108. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 108.

109. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 109.

110. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 110.

111. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 111.

112. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 112.

113. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 113.

114. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 114.

115. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 115.

116. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 116.

117. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 117.

118. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 118.

119. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 119.

120. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 120.

121. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 121.

122. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 122.

123. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 123.

124. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 124.

125. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 125.

126. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 126.

127. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 127.

128. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 128.

129. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 129.

130. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 130.

131. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 131.

132. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 132.

133. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 133 and its sub-parts.

134. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 134.

135. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 135.

136. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 136.

137. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 137.

138. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 138.

139. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 139.

140. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 140.

141. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 141.

142. Defendant denies the allegations in paragraph 142 to the extent they pertain to him.

143. Defendant denies the allegations in paragraph 143.

144. Defendant admits he knew Rick Hubbard when they attended grade school together. Defendant denies the remaining allegations in paragraph 144 to the extent they pertain to him.

145. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 145.

146. Defendant admits he is a Texas Ranger with the Department of Public Safety and specializes in human trafficking. Defendant denies the remaining allegations in paragraph 146 to the extent they pertain to him.

147. Defendant admits one of the investigations he was involved in was the subject of a television production. Defendant denies the remaining allegations in paragraph 147 to the extent they

pertain to him.

148. Defendant denies the allegations in paragraph 148 to the extent they pertain to him. Defendant specifically denies any knowledge of any representations Defendant Hubbard made about him to Plaintiffs.

149. Defendant denies the allegations in paragraph 149 to the extent they pertain to him. Defendant specifically denies any knowledge of any representations Defendant Hubbard made about him to Plaintiffs.

150. Defendant denies the allegations in paragraph 150 to the extent they pertain to him. Defendant specifically denies any knowledge of any representations Defendant Hubbard made about him to Plaintiffs.

151. Defendant denies the allegations in paragraph 151 to the extent they pertain to him. Defendant specifically denies any knowledge of any representations Defendant Hubbard made about him to Plaintiffs.

152. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 152.

153. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 153.

154. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 154.

155. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 155.

156. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 156.

157. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 157.

158. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 158.

159. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 159.

160. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 160.

161. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 161.

162. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 162.

163. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 163.

164. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 164.

165. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 165.

166. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 166.

167. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 167.

168. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 168.

169. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 169.

170. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 170.

171. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 171.

172. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 172.

173. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 173.

174. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 174.

175. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 175.

176. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 176.

177. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 177.

178. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 178.

179. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 179.

180. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 180.

181. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 181.

182. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 182.

183. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 183.

184. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 184.

185. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 185.

186. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 186.

187. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 187.

188. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 188.

189. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 189.

190. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 190.

191. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 191.

192. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 192.

193. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 193.

194. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 194.

195. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 195.

196. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 196.

197. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 197.

198. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 198.

199. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 199.

200. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 200.

201. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 201.

202. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 202.

203. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 203.

204. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 204.

205. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 205.

206. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 206.

207. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 207.

208. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 208.

209. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 209.

210. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 210.

211. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 211.

212. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 212.

213. Defendant denies the allegations in paragraph 213 to the extent they pertain to him.

214. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 214.

215. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 215.

216. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 216.

217. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 217.

218. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 218.

219. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 219.

220. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 220.

221. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 221.

222. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 222.

223. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 223.

224. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 224.

225. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 225.

226. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 226.

227. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 227.

228. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 228.

229. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 229.

230. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 230.

231. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 231.

232. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 232.

233. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 233.

234. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 234.

235. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 235.

236. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 236.

237. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 237.

238. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 238.

239. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 239.

240. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 240.

241. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 241.

242. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 242.

243. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 243.

244. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 244.

245. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 245.

246. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 246.

247. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 247.

248. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 248.

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250. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 250.

251. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 251.

252. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 252.

253. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 253.

254. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 254.

255. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 255.

256. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 256.

257. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 257.

258. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 258.

259. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 259.

260. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 260.

261. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 261.

262. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 262.

263. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 263.

264. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 264.

265. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 265.

266. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 266.

267. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 267.

268. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 268.

269. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 269.

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271. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 271.

272. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 272.

273. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 273.

274. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 274.

275. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 275.

276. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 276.

277. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 277.

278. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 278.

279. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 279.

280. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 280.

281. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 281.

282. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 282.

283. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 283.

284. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 284.

285. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 285.

286. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 286.

287. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 287.

288. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 288.

289. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 289.

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291. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 291.

292. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 292.

293. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 293.

294. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 294.

295. Defendant is without sufficient information or knowledge to be able to admit or deny the allegation in paragraph 295.

296. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 296.

297. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 297.

298. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 298.

299. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 299.

300. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 300.

301. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 301.

302. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 302.

303. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 303.

304. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 304.

305. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 305.

306. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 306.

307. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 307.

308. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 308.

309. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 309.

310. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 310.

311. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 311.

312. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 312.

313. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 313.

314. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 314.

315. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 315.

316. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 316.

317. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 317.

318. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 318.

319. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 319.

320. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 320.

321. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 321.

322. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 322.

323. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 323.

324. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 324.

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326. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 326.

327. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 327.

328. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 328.

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331. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 331.

332. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 332.

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336. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 336.

337. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 337.

338. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 338.

339. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 339.

340. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 340.

341. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 341.

342. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 342.

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356. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 356.

357. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 357.

358. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 358.

359. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 359.

360. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 360.

361. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 361.

362. Paragraph 362 is a legal conclusion to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

363. Defendant denies the allegations in paragraph 363.

364. Defendant denies the allegations in paragraph 364.

365. Defendant denies the allegations in paragraph 365.

366. Paragraph 366 is a legal conclusion to which no response is required. To the extent a response is deemed required, the allegations of this paragraph are denied.

367. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 367.

368. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 368.

369. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 369.

370. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 370.

371. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 371.

372. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 372.

373. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 373.

374. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 374.

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the allegations in paragraph 375.

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382. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 382.

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387. Defendant is without sufficient information or knowledge to be able to admit or deny

the allegations in paragraph 387.

388. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 388.

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391. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 391.

392. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 392.

393. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 393.

394. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 394.

395. Defendant is without sufficient information or knowledge to be able to admit or deny the allegations in paragraph 395.

E. Causes of Action

396. Defendant realleges and reincorporates its responses in Paragraphs 1–395 as if fully set forth herein.

397. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 397 are denied.

398. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 398 are denied.

399. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 399 are denied.

400. Defendant realleges and reincorporates its responses in Paragraphs 1–399 as if fully set forth herein.

401. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 401 are denied.

402. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 402 are denied.

403. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 403 are denied.

404. Defendant realleges and reincorporates its responses in Paragraphs 1–403 as if fully set forth herein.

405. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 405 are denied.

406. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 406 are denied.

407. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 407 are denied.

408. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 408 are denied.

409. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 409 are denied.

410. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 410 are denied.

411. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 411 are denied.

412. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 412 are denied.

413. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 413 are denied.

414. Defendant realleges and reincorporates its responses in Paragraphs 1–413 as if fully set forth herein.

415. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 415 are denied.

416. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 416 are denied.

417. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 417 are denied.

418. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 418 are denied.

419. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 419 are denied.

420. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 420 are denied.

421. This paragraph sets forth legal conclusions to which no response is required. To the extent a response is deemed required, the allegations of paragraph 421 are denied.

F. Damages

Defendant denies that Plaintiffs are entitled to damages in the form of compensatory, punitive,

or injunctive relief. Furthermore, Defendant denies that Plaintiffs are entitled to any of the relief requested in their Second Amended Complaint.

DEFENDANT'S OTHER ANSWERS AND AFFIRMATIVE DEFENSES

448. Defendant admits that the Department of Public Safety ("DPS") is a State of Texas agency.

449. Defendant admits that he was employed by DPS and acted in his official capacities at all times relevant to Plaintiffs' claims and are thus entitled to official immunity.

450. Defendant denies that he acted separately or in concert with others to engage in illegal conduct to injure Plaintiffs.

451. Defendant denies that he knowingly and affirmatively participating, directly or indirectly, in the alleged deprivation of any right, privilege, or immunity granted or secured by the Constitution and laws of the United States Plaintiffs allege they suffered.

452. Defendant asserts that some or all of Plaintiffs' claims may be barred by the applicable statute of limitations.

453. Defendant asserts that at all times relevant to the allegations against him, he acted in good faith and with a reasonable belief that his acts were in compliance with the laws and Constitution of the United States and claim entitlement to qualified immunity from suit. Defendant did not violate clearly established law of which a reasonable public official would have known.

454. Defendant asserts that actions taken relative to Plaintiffs, concerning any claim alleged in this lawsuit, were based on a good faith belief that such actions were taken in accordance with agency policy and applicable law.

455. Defendant asserts Eleventh Amendment immunity to all applicable claims.

456. Defendant asserts the defenses of res judicata, laches, estoppel, waiver, and lack of jurisdiction to Plaintiffs' claims in this lawsuit.

457. Plaintiffs' claims, including but not limited to its RICO claims, are barred by the four-year statute of limitations.

458. Plaintiffs' damages, if any, were caused, in whole or part, by the acts or omissions of Plaintiffs and third parties over which Defendant has no control and for which is not legally responsible. Plaintiffs' recovery, if any, should be barred or proportionately reduced by Plaintiffs' and third parties' fault or degree of responsibility.

459. Plaintiffs' claims are barred, in whole or part, because the damages they seek are too speculative and remote due to the impossibility of the ascertainment and allocation of such alleged damages.

460. Plaintiffs' claims are barred, in whole or in part, or, at a minimum, recovery should be reduced under the doctrines of avoidable consequences and/or the failure to mitigate. To the extent Plaintiffs may have suffered any damages, they were required to take reasonable and timely actions to limit their losses, which they failed to do.

461. Should any loss, injury, damages, or detriment occurred as alleged in the Second Amended Complaint, Defendant is entitled to an offset or setoff for the amounts Plaintiffs recover from any other person for such loss, injury, damages, or detriment including, but not limited to, amounts recovered from any settling party related to this lawsuit.

462. Plaintiffs' claims are barred, in whole or in part, because they failed to join indispensable parties to this litigation, improperly joined parties and/or named the wrong parties in the Second Amended Complaint.

463. Plaintiffs' claims are barred by the doctrine of *in pari delicto* because, as alleged, Plaintiffs knowingly participated in the alleged conduct and received benefits therefrom.

464. Defendant asserts his right to raise additional defenses that become apparent throughout the factual development of the case.

465. Defendant denies that Plaintiffs are entitled to damages or any other relief demanded in Plaintiffs' Second Amended Complaint.

466. Defendant prays for judgment as follows:

- a. Plaintiffs take nothing by reason of their Second Amended Complaint;
- b. Judgment be entered in favor of Defendant on the Second Amended Complaint;
- c. The Court award Defendant the cost incurred by him in this matter; and
- d. The Court award such other relief to Defendant as it may deem just and proper.

Respectfully Submitted,

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Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

GRANT DORFMAN

Deputy First Assistant Attorney General

JAMES LLOYD

Deputy Attorney General for Civil Litigation

SHANNA E. MOLINARE

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/s/ Alec Simpson

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I, **Alec Simpson**, Assistant Attorney General of Texas, certify that a correct copy of the foregoing **Defendant's Answer in Response to Plaintiffs' Second Amended Complaint** has been served via electronic filing on April 4, 2024, to all counsel of record.

/s/ Alec Simpson

ALEC SIMPSON

Assistant Attorney General